



CVCWA

Central Valley Clean Water Association

Representing Over Fifty Wastewater Agencies

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September 3, 2013

Via Electronically Only

Ms. Stacy Gotham
Water Resources Control Engineer
Regional Water Quality Control Board,
Central Valley Region
364 Knollcrest Drive
Redding, CA 96002
sgotham@waterboards.ca.gov

RE: Comments on Tentative Order No. R5-2013-XXXX Amending Cease and Desist
Order R5-2010-0033-XX, Quincy Community Services District, Quincy Wastewater
Treatment Plant, Plumas County

Dear Ms. Gotham:

The Central Valley Clean Water Association (CVCWA) appreciates the opportunity to submit comments on the Tentative Order Amending Cease and Desist Order R5-2010-0033-XX for the Quincy Community Services District (District), Quincy Wastewater Treatment Plant (Tentative CDO). CVCWA is a non-profit association of public agencies located within the Central Valley region that provide wastewater collection, treatment, and water recycling services to millions of Central Valley residents and businesses. We approach these matters with the perspective of balancing environmental and economic interests consistent with state and federal law. In this spirit, we provide the following limited comments with respect to the consideration of dilution credits for the Quincy Wastewater Treatment Plant.

As an initial matter, CVCWA must first convey that it supports adoption of the Tentative CDO for the Quincy Wastewater Treatment Plant, which includes revised interim effluent limitations for copper and interim effluent limitations for lead.

However, CVCWA submits these comments with respect to a broader issue of concern. Based on the information contained in the Tentative CDO, it appears that the District has submitted more than sufficient information to justify the adoption of dilution credits for lead and copper. For example, Finding 5 describes the extensive work that the District has undertaken to justify dilution credits: “. . . : installation of a new outfall with effluent flow monitoring controls and a diffuser, submittal of an antidegradation analysis, installation of a gaging station in Spanish Creek to control the discharge and in-stream dilution, completion of a biological assessment in the proposed mixing zone area, and submittal of a mixing zone and dilution study.” (Tentative CDO, p. 1.) Considering the significant effort taken for justification of dilution credits, it appears to CVCWA that it would be more appropriate for the Central Valley Regional Water Quality Control Board (Regional Board) to re-open the permit to adopt dilution credits.

Further, adoption of dilution credits would provide the District with more certainty and protection from mandatory minimum penalties (MMPs). Specifically, the Tentative CDO limits protection from MMPs for five years from the previous permit adoption date of 18 March 2010. Thus, protection from MMPs will expire automatically on 18 March 2015. If the Regional Board fails to re-issue the District's new permit prior to that date, the District will be subject to compliance with the final effluent limitations for copper and lead as they currently exist in the 2010 Order, which does not account for dilution. If unable to meet the final limits, the District will then be subject to MMPs.

Accordingly, CVCWA recommends that the Regional Board adopt the Tentative CDO as issued to provide immediate relief from MMPs for lead. But, rather than waiting for the permit to expire in 2015, CVCWA recommends that the Regional Board re-open the permit and provide the District with appropriate dilution credits based on the information submitted as soon as possible.

We appreciate your consideration of these comments and request that you revise the Tentative CDO as suggested above. If you have any questions or if CVCWA can be of further assistance, please contact me at (530) 268-1338 or eoofficer@cvcwa.org.

Sincerely,



Debbie Webster
Executive Officer

cc (*via electronically*): Pamela Creedon, Central Valley Regional Water Quality Control Board